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7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 LAURA MAYBAUM, on behalf of
12 herself and all others similarly situated,

13 Plaintiff,

14 vs.

15 TOYS "R" US, INC., a Delaware
16 corporation, TOYS "R" US-
17 DELAWARE, INC., a Delaware
18 corporation, TOYSRUS.COM, INC., a
19 Delaware corporation, BABIES "R" US,
INC., a Delaware corporation,
BABIESRUS.COM, LLC, a Delaware
20 limited liability company and DOES 1
through 20, inclusive,

21 Defendants.

Case No. LACV11-7063 R(PJWx)

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**DEFENDANTS' DISCLOSURE
STATEMENT**

[FRCP 7.1]

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, defendants
Toys "R" Us, Inc., Toys "R" Us – Delaware, Inc., and the improperly named
Toysrus.com, Inc., Babies "R" Us, Inc. and Babiesrus.com, LLC, through counsel,
hereby state:

1. Toys "R" Us, Inc. has no parent company.

2. Three investment firms own approximately 98.1% of Toys "R" Us, Inc.'s outstanding voting common stock: (1) Bain Capital Partners, LLC; (2) Kohlberg Kravis Roberts & Co. L.P.; and (3) Vornado Realty Trust.

3. Toys "R" Us, Inc. is the ultimate parent company of Toys "R" Us – Delaware, Inc. and Toys "R" Us, Inc. owns 100% of Toys "R" Us-Delaware, Inc.'s stock.

4. Purported Defendants Toysrus.com, Inc., Babies "R" Us, Inc., and Babiesrus.com, LLC are no longer actual corporate entities. Toysrus.com and Babiesrus.com are websites maintained by Toys "R" Us-Delaware, Inc. and are not incorporated entities. Babies "R" Us is a brand name owned and operated by Toys "R" Us-Delaware, Inc.

Defendants expressly reserve their right to amend or supplement this Rule 7.1 Disclosure in the future.

Dated: August 26, 2011

MORGAN, LEWIS & BOCKIUS LLP

By

Joseph Duffy

Attorneys for Defendants